

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

PENG WANG, QINLIN LI, and YISI  
WANG,

*Plaintiffs,*

v.

KEN PAXTON, Attorney General of Texas,  
in his Official Capacity, only.

*Defendant.*

Case No.

**DECLARATION OF YISI WANG**

I, Yisi Wang, being of competent mind and over the age of 18, declare as follows:

1. I am a Chinese citizen and a resident of Sugar Land, Texas.
2. I am one of the plaintiffs in the above-captioned civil action.
3. I am not a member of the Chinese communist party or the Chinese government.
4. I am a law-abiding individual without any criminal record.
5. I have a graduate degree from the University of Texas at Austin, and I have built my family and career in Texas. I also volunteer at a parent advisory committee at the local school district.
6. I am an actuary and currently work for a life insurance company with an H-1B work visa.
7. I have lived in the United States for nearly 16 years and Texas for over 7 years.
8. I am in the process of applying for a green card so that I can live in Texas long term. I have submitted a Form I-485 for an adjustment of status to a lawful permanent resident (green card holder) for me and my family, but we have not reached our priority date for

processing yet.

9. I own a house in Sugar Land as my primary residence, and had made plans to purchase additional properties for investment purposes. I recently worked with an agent starting looking at some properties and I tried to go through with the pre-approval process with a loan broker. Now I have to stop because of SB 17.

10. I think SB 17 is a racist law because it targets a specific group of people that are from China. I understand that the United States and China are geopolitical rivals, but I am not sure what goals that SB 17 achieves by prohibiting regular Chinese people from buying a second residential property in Texas. These restrictions are burdensome and discriminatory to me. I am very worried that the law will be used to target me, discriminate against me, and generally harass me as a Chinese property owner.

11. The assumptions behind SB 17 make no sense because it considers all Chinese people so untrustworthy and dangerous that they are not allowed to freely buy, own, and lease real properties. I feel that as a Chinese person, I have been singled out and targeted by the law simply because of where I came from, my ancestry, and my alienage status. The law stigmatizes me and wrongly treats me as suspicious because I am Chinese.

12. I would like to call Texas my home, as I have lived and worked here long enough. This is why I have built my community connections, paid my taxes, and contributed to the economy here. That is why I am extremely distressed at the prospect of never being able to purchase additional property in Texas. I am also worried about my future ability to make another property purchase in Texas, even to move within the state by selling my current home and buying a new home in Texas.

13. Relatedly, I am also very worried that I will be discriminated against by future

sellers and real estate agents if I sell my property and seek to purchase another home, because of their fear of the risk of violating the law and because I am Chinese.

14. In recent years, Chinese immigrants and Asian Americans in general have become targets of racial hatred and violence because of the rising tension between the United States and China. I fear that the new law in Texas will fan the flames of racial hatred against Chinese immigrants and Asian Americans in general.

15. Finally, a violation of SB 17 could be a felony, which means jail time, the end of my professional career, and maybe even deportation. I cannot image that buying a house can face such a harsh penalty.

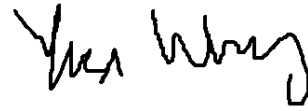
16. On June 29, 2025, I spoke with my attorney Keliang “Clay” Zhu extensively about the nature of a class action and the potential advantages and disadvantages to me by bringing a class action rather than going individually. I bring this case with the understanding that I am serving as a volunteer not only to protect my own rights, but to protect the rights of all people affected by the law, which is why I agree to become a plaintiff and a representative of the class.

17. I am willing and able to fulfill my obligations as class representatives, including responding to reasonable discovery requests, with the help of my lawyers to protect the fundamental constitutional rights of the class that I represent. I discussed with my lawyer the responsibility of pursuing a class action on behalf of people covered by the law, whether because they are Chinese or because they are from one of the other three countries covered by SB 17.

18. I am familiar, and can demonstrate that familiarity, with the allegations in this lawsuit. After talking with my lawyer, I understand the concept of a class action, and the relief

sought in this action.

I declare under the penalty of perjury that the forgoing is true and accurate, and that this declaration is executed at Sugar Land, Texas on July 1<sup>st</sup>, 2025.

A handwritten signature in black ink, appearing to read "Yisi Wang", written in a cursive style.

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Yisi Wang